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19

20 UNITED STATES DISTRICT COURT
21 DISTRICT OF NEVADA

22 M.S., a minor individual, by Guardian
23 VALERIE SANDERS,
24 Plaintiffs,

25 Vs.
26

27 HYUNDAI MOTOR AMERICA, a California
28 business entity; HYUNDAI MOTOR
COMPANY, a Korean corporation; TAKATA
CORPORATION a Japanese corporation; ZF
TRW AUTOMOTIVE HOLDINGS CORP., a
Delaware Corporation; ZF
FRIEDRICHSHAFEN AG, a German
Corporation; ROE AIRBAG
MANUFACTURING COMPANY; DOE
INDIVIDUALS I through XXX and ROE
CORPORATIONS XXXI through LX,
Defendants.

Case Number:
2:20-cv-01861-GMN-BNW

**STIPULATION AND ORDER OF
DISMISSAL FOR ZF TRW
AUTOMOTIVE HOLDINGS
CORP.**

1 Plaintiff M.S., a minor individual, by Guardian VALERIE SANDERS (“Plaintiff”),
2 by and through her counsel KEMP JONES LLP and Defendant ZF TRW AUTOMOTIVE
3 HOLDINGS CORP. (“ZF TRW AH”), by and through its counsel of record, WEINSTEIN
4 TIPPETTS & LITTLE LLP and OLSON, CANNON, GORMLEY & STOBERSKI, hereby
5 stipulate and agree as follows:

6 1. Plaintiff and Guardian Valerie Sanders, for minor individual M.S., no longer
7 wishes to pursue her claims against ZF TRW AH because ZF TRW AH has provided
8 Plaintiff with a declaration confirming no corporate entity within the ZF group of
9 companies designed, manufactured, or marketed the original equipment seat belt assembly
10 or any component of the original equipment seat belt assembly for 2012 Hyundai Elantra
11 vehicles sold in the United States, including the webbing, buckle, retractor, latch plate, or
12 pretensioners within the assembly. ZF TRW AH’s declaration also confirms no corporate
13 entity within the ZF group of companies designed, manufactured, or marketed the original
14 equipment airbag system or any component of the original equipment airbag system for
15 2012 Hyundai Elantra vehicles sold in the United States, including the airbag control unit,
16 front and side crash sensors, or airbag modules within the system

17 2. ZF TRW AH should be dismissed *without prejudice*.

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3. Plaintiffs and ZF TRW AH shall bear their own attorneys' fees, costs, and expenses in connection with this stipulation and/or the dismissal of ZF TRW AH.

KEMP JONES, LLP

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IT IS SO ORDERED.

U.S. DISTRICT COURT JUDGE

DATED:

CASE NO. 2:20-cv-01861